

Response to RM-10811 as proposed by the FISTS CW Club

Dear Commissioners,

Of all the proposed dockets concerning the Morse code requirement for Amateur Radio licensees, in my view, RM-10811 presents the most balanced proposal to maintain the Amateur Radio Service as an effective emergency communications service. The FISTS CW Club is to be commended for their excellent and futuristic proposal. The other proposals, although well intentioned, fall short in measuring up to the standards set forth in the FISTS proposal RM-10811.

Many countries have decided to eliminate the Morse code as a requirement. However, it has become increasingly obvious to this observer that terrorist and/or subversive threats are not nearly as pervasive in these countries as in the U.S.A. In some of these countries, there is no concern whatsoever. None of these countries has a Homeland Security Department devoted entirely to dealing with terrorist threats.

Recently, the Amateur Radio community has joined with the Homeland Security Department to formulate plans to provide communications during emergencies. This may or may not be connected to Homeland Security (it could) but there is currently being organized a radio network titled the National Radio Emergency Network (NREN). The NREN is designed to provide a 24 hour emergency communications capability for fixed, portable, or mobile stations. The purpose of NREN is to provide quick message delivery and origination links between high frequency equipped amateur radio operators and such resources as the internet, public switched telephone networks, and related systems.

Radiotelegraphy, or "CW" (Morse) has been selected as the *basic* operating mode for NREN. This choice was made for a variety of reasons:

CW is ideal for maintaining watch on a specific frequency. Its narrow bandwidth allows those stations monitoring a selected frequency to eliminate adjacent channel interference to a degree NOT possible with voice or digital modes.

CW is ideal for portable operation. This mode permits extended operation with low-power battery operated equipment. The narrow bandwidth nature of the mode is such that accurate and effective communications can be maintained at power levels far below those required for voice mode.

CW is universally available on all equipment manufactured for use in the HF spectrum. In addition, because this mode does not require the use of a computer or terminal, it is ideal for emergency or portable field deployment.

In order to foster our commitment to Homeland Security and to encourage communications networks such as the NREN, it is important that more amateur radio operators skilled in the radiotelegraphy mode be trained. Without a Morse component in the Amateur Radio Service syllabus, this will not be possible.

Therefore I respectfully encourage you to retain the Morse element as part of the Amateur Radio Service examination. In particular, I encourage you to adopt the FISTS CW Club proposal, RM-10811.

Yours truly,

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